

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

MUKESH KUMAR, KESHAV KUMAR,  
DEVI LAAL, NIRANJAN, PAPPU,  
BRAJENDRA, MAHENDRA KUMAR,  
SHYAM SUNDER, PREM SINGH, BABLU,  
CHHAIL WIHAREE, RAMKISHAN,  
HARENDRA, LAUXMI NARAIN, RAMA  
RAM, UMESH CHAND, VIJENDRA  
SINGH, RAMESH KUMAR, DEVA RAM,  
RUPA RAM, and KHIMA RAM REBARI, *on  
behalf of themselves and all others similarly  
situated,*

*Plaintiffs,*

*v.*

BOCHASANWASI SHRI AKSHAR  
PURUSHOTTAM SWAMINARAYAN  
SANSTHA, INC.,  
BAPS MERCER LLC,  
BAPS ROBBINSVILLE LLC,  
BAPS FELLOWSHIP SERVICES, INC.,  
BAPS ATLANTA, LLC,  
BAPS CHINO HILLS, LLC,  
BAPS DEVELOPMENT, INC.,  
BAPS HOUSTON, LLC,  
BAPS CHICAGO, LLC,  
BAPS BOCHASANWASI SHRI  
AKSHARPURUSHOTTAM  
SWAMINARAYAN SANSTHA (an India  
Public Trust),  
BHARAT PATEL, PANKAJ PATEL, KANU  
PATEL, RAKESH PATEL, HARSHAD  
CHAVDA, and PRASHANT DARSHAN  
DAS SADHU,

*Defendants.*

Civ. Action No.: 21-CV-11048

**NOTICE OF MOTION  
FOR LEAVE TO FILE A  
SECOND AMENDED  
COMPLAINT**

PLEASE TAKE NOTICE that upon the January 26, 2022 Declaration of Andrew Glenn, the Proposed Second Amended Class and Collective Action Complaint annexed to that declaration, the Memorandum of Law of Plaintiffs, and all other papers heretofore had in this matter, the undersigned counsel for Plaintiffs Mukesh Kumar, Keshav Kumar, Devi Laal, Niranjan, Pappu, Brajendra, Mahendra Kumar, Shyam Sunder, Prem Singh, Bablu, Chhail Wiharee, Ramkishan, Harendra, Lauxmi Narain, Rama Ram, Umesh Chand, Vijendra Singh, Ramesh Kumar, Deva Ram, Rupa Ram, and Khima Ram Rebari will move this Court, before the Honorable Anne Thompson, United States District Judge for the District of New Jersey, at the United States Courthouse, 402 East State Street Trenton, NJ 08608, at a date and time to be determined by the Court, for leave to file a Second Amended Complaint in this action correcting a typographical error in the name of one of the foreign Defendants and adding an alternative spelling of that Defendant's name.

The Defendants who have appeared to date have indicated that they do not object to this motion.

Responsive papers, if any, are due in accordance with the schedule set forth by the Court. Plaintiffs respectfully request that the Court enter the attached Proposed Order granting Plaintiffs leave to file a Second Amended Complaint.

DATED: Princeton, NJ  
January 26, 2022

JAFFE GLENN LAW GROUP

/s/ Andrew Glenn  
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